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Attorneys for Defendant  
AMADOR AVENUE PROPERTIES, LLC

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:  
  
GRAND VIEW FINANCIAL, LLC,  
  
Debtor and Debtor in Possession.

GRAND VIEW FINANCIAL, LLC,

Plaintiff,  
vs.

DEUTSCHE BANK TRUST COMPANY  
AMERICAS, AS TRUSTEE FOR  
RESIDENTIAL ACCREDIT LOANS, INC.,  
MORTGAGE ASSET-BACKED  
PASSTHROUGH CERTIFICATES, SERIES  
2006-Q0C; AZTEC FORECLOSURE  
CORPORATION; and AMADOR AVENUE  
PROPERTIES, LLC,

Defendants.

Case No.: 2:17-bk-20125-RK

Chapter 11

Adv. No. 2:18-ap-01018-RK

**DEFENDANT AMADOR AVENUE  
PROPERTIES, LLC'S JOINDER TO  
DEFENDANTS' DEUTSCHE BANK  
TRUST COMPANY AMERICAS AND  
AZTEC FORECLOSURE  
CORPORATIONS MOTION FOR  
SUMMARY JUDGMENT**

**Hearing:**

Date: May 22, 2018

Time: 3:00 p.m.

Place: Courtroom 1675

Roybal Federal Building

255 E. Temple Street

Los Angeles, CA 90012

Judge: Hon. Robert N. Kwan

**JOINDER**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that Defendant Amador Avenue Properties, LLC ("Amador"), through the undersigned counsel, respectively joins in Defendants Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Passthrough Certificates, Series 2006-Q0C ("Deutsche Bank") and Aztec Foreclosure Corporation's ("Aztec") (Deutsche Bank and Aztec are referred to hereinafter collectively as "Defendants") *Motion for Summary Judgment Pursuant to Fed. R. Civ. P. 56* (the "Motion for Summary Judgment") [Adv. Docket No. 19].

By the Motion for Summary Judgment, Defendants seek judgment on the first, fourth and fifth claims for relief set forth in the underlying complaint. Amador joins in the Motion for Summary Judgment on the first and fifth claims for relief. Amador asserts that the arguments advanced by Defendants regarding the first and fifth claims for relief apply equally to any claims against Amador, which are or may be encompassed within those claims for relief. Moreover, the second and third claims for relief (declaratory relief against Amador regarding the pending unlawful detainer action in the Superior Court of California and turnover of the property at issue) are wholly dependent upon Plaintiff prevailing upon the first claim for relief. Accordingly, if judgment is entered in favor of Defendants on the first claim for relief, judgment must be entered (or the claims otherwise dismissed) in favor of Amador on the first, second and third claims for relief.

In addition to this Joinder, Amador intends to file a joinder to Defendants *Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c)* (the "Defendants' Motion for Judgment on the Pleadings") [Adv. Docket No. 19], along with its own Motion for Judgment on the Pleadings, with such joinder and motion to be set for hearing at the same time as the Motion for Summary Judgment. Amador's further joinder and separate motion will be filed in accordance with the timeline set forth in the Local Bankruptcy Rules for the Central District of California to be heard May 22, 2018.

1 The undersigned concur in the arguments set forth in the Motion for Summary Judgment  
2 and adopt and incorporate them in full herein.

3 For the reasons set forth in the Motion for Summary Judgment, judgment should be  
4 entered in favor of Defendants on the first, fourth and fifth claims for relief. As a consequence of  
5 judgment being entered in favor of Defendants on the first and fifth claims for relief, judgment  
6 must be entered in favor of Amador on the first, second and third claims for relief. Amador prays  
7 for relief in accordance with the foregoing and for such other and further relief that the Court may  
8 deem just and proper.

9 Respectfully submitted,  
10 Dated: April 10, 2018 RICHARD D. MARKS  
11 PROFESSIONAL CORPORATION  
12 - and -  
13 JEFFER MANGELS BUTLER &  
14 MITCHELL LLP  
15 DAVID M. POITRAS  
16 THOMAS M GEHER  
17 /s/ David M. Poitras  
18 Attorneys for Defendant, AMADOR  
19 AVENUE PROPERTIES, LLC  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067-4308

A true and correct copy of the foregoing document entitled (specify): **DEFENDANT AMADOR AVENUE PROPERTIES, LLC'S JOINDER TO DEFENDANTS' DEUTSCHE BANK TRUST COMPANY AMERICAS AND AZTEC FORECLOSURE CORPORATIONS MOTION FOR SUMMARY JUDGMENT**; will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) April 10, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Todd M Arnold tma@lnbyb.com
- Angie M Marth amarth@logs.com, ssali@logs.com
- David M Poitras dpoitras@jmbm.com, bt@jmbm.com;vr@jmbm.com;dmp@ecf.inforuptcy.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) April 10, 2018 I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

### **SERVED BY OVERNIGHT MAIL**

Honorable Robert N. Kwan  
United States Bankruptcy Court  
Central District of California  
Edward R. Roybal Federal Building and Courthouse  
255 E. Temple Street, Suite 1682  
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 10, 2018

Billie Terry



Date

Printed Name

Signature